

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

JOHN WILEY & SONS, LTD., AND	)	
AMERICAN INSTITUTE OF PHYSICS,	)	
	)	
Plaintiffs,	)	
	)	
-against-	)	12 C 1446
	)	
MCDONNELL BOEHNEN HULBERT	)	Judge Norgle
	)	
& BERGHOFF LLP, AND JOHN DOE	)	Magistrate Judge Arlander Keys
NOS. 1-10,	)	
	)	
Defendants,	)	
	)	
-and-	)	
	)	
THE UNITED STATES PATENT AND	)	
TRADEMARK OFFICE,	)	
	)	
Intervening Defendant and	)	
Counterclaim Plaintiff.	)	

**PLAINTIFFS' RESPONSE TO DEFENDANTS' MOTION  
FOR A PROTECTIVE ORDER**

Plaintiffs, John Wiley & Sons, Ltd. and American Institute of Physics (the "Publishers") respectfully submit this response to the motion of Defendant McDonnell Boehnen, Hulbert and Berghoff LLP ("McDonnell") for entry of a protective order.

The Publishers request that the Court enter the protective order annexed as Exhibit A. Unlike the protective order McDonnell has proposed, this proposed protective order would allow in-house counsel and employees of John Wiley & Sons, Inc. to review confidential material. These persons are identified by name in paragraph 4.b. of the proposed protective order, and are the decision makers for John Wiley & Sons Ltd., a

wholly-owned subsidiary of John Wiley & Sons, Inc., a public company. Each person will agree to be bound by the term of this protective order. Unless they are allowed to review confidential material in this action, John Wiley & Sons, Ltd. will be prejudiced.

Respectfully submitted,

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Certificate of Service

The undersigned certifies that a copy of the foregoing Plaintiffs' Response To Defendants' Motion for a Protective Order was served via the ECF system on the following counsel of record on December 4, 2012:

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